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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT DISTRICT OF NEW YORK

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In re: Chapter 11
Case No. 17-42418(nhl)
Marlene Marshalleck

Debtor.
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**APPLICATION FOR ORDER SETTING
LAST DATE FOR FILING OF CLAIMS**

**TO: THE HONORABLE NANCY HERSHEY LORD,
UNITED STATES BANKRUPTCY JUDGE:**

The Application of Marlene Marshalleck the above captioned debtor and debtor-in-possession (the "Debtor"), by her attorneys, Arlene Gordon-Oliver & Associates, PLLC, respectfully represents and sets forth as follows:

1. On April 19, 2017, (the "Filing Date"), the Debtor filed her voluntary petition for reorganization pursuant to Chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (the "Bankruptcy Code").
2. Thereafter the Debtor's proceeding was referred to Your Honor for administration under the Code.
3. The Debtor has continued in possession of her property and the management of her business affairs as a debtor-in-possession pursuant to § 1107 and 1108 of the Code.

4. No Official Committee of Unsecured Creditors, a trustee, or examiner has been appointed.
5. The Debtor is engaged in the business of operating several parcels of real property as investment properties located in the Brooklyn, New York. The investment properties are multifamily dwellings and are rented to third parties.
6. The Debtor filed her Schedules of Assets and Liabilities and Statement of Financial Affairs on June 7, 2017.
7. Therefore, the Debtor respectfully submits that it is necessary that an Order be made and entered by this Court fixing a date by which certain claims must be filed by the holders thereof.
8. In order for the Debtor to properly proceed with a plan of reorganization, it is likewise necessary that creditors be advised that they must file their claims by a specific time. In that regard, the Debtor respectfully submits that a Bar Order is essential for proper administration of this case.
9. It is requested that the Court enter the pre-fixed proposed Order annexed as **Exhibit "A"** (the "Proposed Bar Order"). The Proposed Bar Order provides that all claims as defined in Section 101(5) of the Bankruptcy Code, other than those specifically excepted by the Proposed Bar Order, shall be filed with this Court, in writing, substantially in conformity with Official Bankruptcy Form 410 on or before **August 30, 2017** (the "Bar Date"), at the Office of the Clerk of the Bankruptcy Court. The pre-fixed Proposed Bar Order further provides that claims already filed or listed in the Debtor's schedules as not being contingent, disputed or un-liquidated are excepted from the provisions of said Order and are not

required to be filed before the Bar Date, as are claims of professionals duty retained pursuant to order of retention signed by the Court pursuant to Section 327 of the Code. In addition, claims of governmental units under 11 U.S.C. Section 507(a) (8) shall also be excepted from this provision in accordance with 11 U.S.C. Section 502(b) (9).

10. Finally, the pre-fixed, Proposed Bar Order provides that a notice substantially in the form annexed hereto as **Exhibit "B"** shall be mailed by regular mail on or before a date to be fixed by the Court to all persons who are believed to have claims of any kind against the Debtor, including: (i) parties listed in the schedules filed by the Debtor; (ii) all parties filing notices of appearance; (iii) the Debtor's taxing authorities; and (iv) the Office of the United States Trustee; so that those entities entitled to notice shall receive at least thirty-five (35) days notice of the Bar Date. It is respectfully requested that said form of notice also be approved.

11. No prior request for the relief sought herein has been previously made.

WHEREFORE, the Debtor respectfully requests that (1) the Court fix the Bar Date, and (2) that the pre-fixed, Proposed Bar Order be made and entered herein, together with such other and further relief as to this Court may seem just and proper under the circumstances.

Dated: White Plains, New York
June 30, 2017

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By: /s/ Arlene Gordon-Oliver
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